

Remarks

In an Office action mailed August 31, 2007, on page 2 paragraph 1, the Examiner stated “Claims 1-33, and 35-37 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Application Publication No. 2006/0265689 to Kuznetsov et al.”

The Examiner further stated on page 16, immediately preceding paragraph 27, “Claims 34 and 38 are rejected under 35 U.S.C. §103(a) as being unpatentable over Kuznetsov as applied to claim 26 above, and further in view of United States Patent No. 7,181,412 to Fulgoni et al.”

Rejections under 35 U.S.C. §102(e)

On page 2 the Examiner rejected Applicant’s independent claims 1, 14, and 26 as being unpatentable over U.S. Patent Application 2006/0265689 to Kuznetsov et al. (“Kuznetsov”). The Examiner states on page 4, “Regarding claim 1, Kuznetsov teaches a method for *accelerating delivery of requested secure webpages* comprising . . . ‘URL re-writing’ . . . ‘rewriting URLs in an HTTP header’ . . . ‘transformation of pre-transform data according to a transformation function’ . . . [and] ‘returning the request to its original format’.” (Emphasis added.) The Examiner further states on page 8, “Regarding claim 14 Kuznetsov teaches a method for *accelerating delivery of requested secure webpages*.” (Emphasis added.) The Examiner further states on page 18, “Regarding claim 26, Kuznetsov discloses a system for *accelerating delivery of requested secure webpages*.” (Emphasis added.) Applicant respectfully traverses the Examiner’s rejections with regard to all independent claims.

In order to anticipate a claim, a reference must teach all elements of a claim. *See Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631 (Fed. Cir. 1987). In addition, the reference must show the claimed invention “in as complete detail as is contained in the patent claim” in order to anticipate the claimed invention. *Richardson v. Suzuki Motor Co., Ltd.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). *See id.* Applicant will show that the cited reference fails to teach each claimed limitation in as complete detail as Applicant’s independent claims 1, 14, and 26. Therefore, the claims are not anticipated and are thus novel.

Claim 1

Applicant's independent claim 1 recites, *inter alia*,

A method for accelerating delivery of requested secure webpages comprising . . . receiving a request for a secure webpage, the request made using a link in a first received webpage which has been rewritten from an original format at a client proxy such that any request for the secure webpage made by referencing the rewritten link is recognized by a device intermediating between a client and a server capable of responding to the request for the secure webpage . . . returning the request to its original format (Emphasis added.)

In contrast, *Kuznetsov* teaches “[a] **markup language processing device [which] processes markup language messages.**” (See *Kuznetsov*, Abstract. Emphasis added.) *Kuznetsov* further teaches that the markup language processing device “**overcome[s] . . . deficiencies associated with conventional markup language processing implementations.**” (See *Kuznetsov* at paragraph [0022]. Emphasis added.) *Kuznetsov* is merely teaching a method for processing markup language in messages. Specifically, *Kuznetsov* is entirely silent with regard to Applicant's claim 1 element of “accelerating delivery of requested secure webpages.” Therefore *Kuznetsov* completely fails to teach the details associated with “a method for accelerating delivery of requested secure webpages.”

Since *Kuznetsov* is merely teaching “[a] markup language processing device” in contrast to Applicant's claim 1 elements relating to “accelerating delivery of requested secure webpages” *Kuznetsov* does not teach the details of Applicant's independent claim 1 element of “accelerating delivery of requested secure webpages.”

Furthermore, Applicant's independent claim 1 recites, *inter alia*, “**A method for accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten.**” (Emphasis added.) The Examiner cites three references on page 2 paragraph 1 in *Kuznetsov* pertaining to “URL re-writing,” “rewriting URLs in an HTTP header,” and “transformation of pre-transform data according to a transformation function.” The Examiner asserts these three references to *Kuznetsov* is equivalent to teaching “[a] method for accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten” as is recited in Applicant's claim 1.

With reference to the Examiner's first reference of "URL re-writing," *Kuznetsov* teaches that the "markup processor can optionally performing [sic, perform] additional data processing such as, for example . . . URL re-writing." (See *Kuznetsov* at paragraph [0027].) *Kuznetsov* is merely teaching "URL re-writing" as an option for processing markup language. *Kuznetsov* is entirely silent with regard to teaching Applicant's claim 1 element of "accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten." Therefore, *Kuznetsov* does not teach the details of "accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten."

Since *Kuznetsov* is only teaching that the "markup processor can optionally performing [sic, perform] additional data processing such as, for example . . . URL re-writing" in contrast to Applicant's claim 1 element of "accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten," *Kuznetsov* is not teaching the details of Applicant's independent claim 1 element of "accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten."

With regard to the Examiner's second reference of "rewriting URLs in an HTTP header," *Kuznetsov* teaches that "a variety of different processing operations can be performed in the message data . . . such as rewriting URLs in an HTTP header." (See *Kuznetsov* at paragraph [0096].) Here, *Kuznetsov* simply teaches "rewriting URLs in an HTTP header" as one possible option for processing markup language. However, once again, *Kuznetsov* is entirely silent with regard to the teaching of Applicant's claim 1 element of "accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten." Therefore, *Kuznetsov* again completely fails to teach the details of "accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten."

Since *Kuznetsov* is merely teaching that "a variety of different processing operations can be performed in the message data . . . such as rewriting URLs in an HTTP header," in contrast to Applicant's claim 1 element of "accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has

been rewritten” *Kuznetsov* does not teach the details of Applicant’s independent claim 1 element of “accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten.”

In response to the Examiner’s third reference of “transformation of pre-transform data according to a transformation function,” *Kuznetsov* teaches that “the message 140 arrives at the markup language processing device such that transformation of pre-transform data according to a transformation function . . . of a transformation in the sequence of transformations commences during streaming and prior to completely receiving the entire message.” (See *Kuznetsov* at paragraph [0097].) Here, *Kuznetsov* merely teaches when it is that the markup language processing device processes markup language as means for processing markup language. Specifically, *Kuznetsov* is entirely silent with regard to Applicant’s claim 1 element of “accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten.” Therefore, *Kuznetsov* completely fails to teach the details of “accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten.”

Since *Kuznetsov* is only teaching that “the message 140 arrives at the markup language processing device such that transformation of pre-transform data according to a transformation function . . . of a transformation in the sequence of transformations commences during streaming and prior to completely receiving the entire message,” in contrast to Applicant’s claim 1 element of “accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten,” *Kuznetsov* cannot and does not teach the details of Applicant’s independent claim 1 element of “accelerating delivery of requested secure webpages comprising . . . the request made using a link in a first received webpage which has been rewritten.”

Applicant’s independent claim 1 recites, *inter alia*, “accelerating delivery of requested secure webpages comprising . . . returning the request to its original format.” The Examiner has cited to *Kuznetsov* at paragraph [0128] as the reason for the rejection. Therein, *Kuznetsov* teaches

the markup language processing device 120 operates in a loopback mode . . . the markup language processing device 120 receives a message

140 from a computerized device 110 and ***forwards a return message 150 back to the same computerized device 110. The return message 150*** can contain at least one post-transform data portion (e.g., decrypted data) or it ***may be the same content as was in the original message*** (See Kuznetsov at paragraph [0128]. Emphasis added.)

Kuznetsov is merely teaching an ability of the markup language processing device to loop a message back to the source of the message where the message may or may not have been changed by the markup language processing device. Applicant does not teach returning a request back to its source. Rather, Applicant teaches “returning the request to its original format” as part of “a method for accelerating delivery of requested secure webpages.” Kuznetsov is entirely silent on “accelerating delivery of requested secure webpages comprising . . . returning the request to its original format.” Therefore, Kuznetsov completely fails to teach the details of “accelerating delivery of requested secure webpages comprising . . . returning the request to its original format.”

Since Kuznetsov is merely teaching “the markup language processing device 120 operates in a loopback mode” where a return message “may be the same content as was in the original message,” Kuznetsov does not teach the details of Applicant’s independent claim 1 element of “accelerating delivery of requested secure webpages comprising . . . returning the request to its original format.”

As Applicant has shown, Kuznetsov does not teach in as complete detail as Applicant’s claim 1 limitations relating to “for accelerating delivery of requested secure webpages.” Kuznetsov therefore can not and does not anticipate Applicant’s independent claim 1. Therefore, Applicant respectfully requests the Examiner remove the anticipation rejection to claim 1 under 35 U.S.C. §102(e). Moreover, since claims 2-13 depend from claim 1, they too are allowable for at least the same reasons. Further, each of the dependent claims 2-13 may also be patentable for its own limitations and/or features.

Claim 14

Applicant’s independent claim 14 recites, *inter alia*,

A method for accelerating delivery of requested secure webpages comprising . . . scanning a webpage to determine whether it contains any links to at least one secure webpage . . . rewriting any link to at least one secure webpage such that a request for the secure webpage made by

referencing the rewritten link is recognized by a device intermediating between a client and a server capable of responding to the request for the secure webpage . . . delivering the scanned webpage to the requesting client. . . receiving a rewritten request for a secure webpage at the device, said request based on the rewritten link . . . returning the request to its original format (Emphasis added.)

As shown above for Applicant's independent claim 1, *Kuznetsov* is only teaching "[a] **markup language processing device [which] processes markup language messages**" (See *Kuznetsov*, Abstract. Emphasis added.) *Kuznetsov* further teaches that the markup language processing device "**overcome[s] . . . deficiencies associated with conventional markup language processing implementations.**" (See *Kuznetsov* at paragraph [0022]. Emphasis added.) *Kuznetsov* does not teach the details "for accelerating delivery of requested secure webpages" as concluded above for Applicant's independent claim 1.

Since *Kuznetsov* does not teach in as complete detail as Applicant's claim 14 limitations relating to "for accelerating delivery of requested secure webpages," *Kuznetsov* can not and does not anticipate Applicant's independent claim 14. Therefore, Applicant respectfully requests the Examiner remove the anticipation rejection to claim 14 under 35 U.S.C. §102(e). Moreover, since claims 15-25 depend from claim 14, they too are allowable for at least the same reasons. Further, each of the dependent claims 15-25 may also be patentable for its own limitations and/or features.

Claim 26

Applicant's independent claim 26 recites, inter alia,

A system for accelerating delivery of requested secure webpages in a network comprising . . . a client proxy having means for rewriting links to any secure webpage in a webpage requested and received by the client, the links rewritten from their original format such that the client's request for a secure webpage based on a rewritten link is recognized as a request for a secure webpage by a device intermediating between the client and the plurality of servers . . . a device intermediating between the client and the plurality of servers, the device having software means for recognizing the rewritten request for a secure webpage, returning the request to its original format, and using the original request to obtain the secure webpage from one of the plurality of servers (Emphasis added.)

As shown above for Applicant's independent claims 1 and 14, *Kuznetsov* merely teaches "[a] **markup language processing device [which] processes markup language messages**" (See *Kuznetsov*, Abstract. Emphasis added.) *Kuznetsov* further teaches that the markup language processing device "**overcome[s] . . . deficiencies associated with conventional markup language processing implementations.**" (See *Kuznetsov* at paragraph [0022]. Emphasis added.) *Kuznetsov* does not teach the details "for accelerating delivery of requested secure webpages" as concluded above for Applicant's independent claims 1 and 14.

Since *Kuznetsov* does not teach in as complete detail as Applicant's claim 26 limitations relating to "accelerating delivery of requested secure webpages" *Kuznetsov* can not and does not anticipate Applicant's independent claim 26. Therefore, Applicant respectfully requests the Examiner remove the anticipation rejection to claim 26 under 35 U.S.C. §102(e). Moreover, since claims 27-38 depend from claim 26, they too are allowable for at least the same reasons. Further, each of the dependent claims 27-38 may also be patentable for its own limitations and/or features.

Rejections under 35 U.S.C. §103(a)

On page 16 the Examiner has rejected Applicant's dependent claims 34 and 38 as being unpatentable over *Kuznetsov*, as applied to claim 26, and further in view of U.S. Patent 7,181,412 to Fulgoni *et al.* ("*Fulgoni*"). However, as Applicant has shown above, claim 26 from which claims 34 and 38 depend, has been shown to be patentable. Therefore, claims 34 and 38 are patentable for at least the same reasons as claim 26. Moreover, *Fulgoni* has no relationship to claim 26.

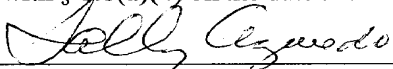
Conclusion

Applicant has shown that independent claims 1, 14, and 26 are not anticipated in light of the cited reference. Moreover, since claims 2-13, 15-25, and 27-38 depend either directly or indirectly from claims 1, 14, and 26 respectively, they too are allowable for at least the same reasons. Further Applicant has shown that the cited references do not teach or suggest all the limitations of Applicant's dependent claims 34 and 38 and that they too are therefore allowable. A Notice of Allowance is requested.

The Examiner is invited to contact the undersigned with any comments or questions at 408-297-9733 between 9:00 AM and 5:00 PM PST.

CERTIFICATE OF MAILING

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4) on the date shown below.

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